

## **Section VI. INSPECTION REPORTING PROCEDURES**

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### **6-1 FREQUENCY OF INSPECTION**

- 6-1.1 STANDARD FREQUENCY**
- 6-1.2 EXEMPTIONS**

#### **6-1.1 Standard Frequency**

The PMA will inspect all food establishments at least once each month unless specifically exempted by the installation regulatory authority. When a food establishment exceeds critical violation limits the PMA must promptly notify the commanding officer and increase the frequency of inspections for the food establishment until the compliance history significantly improves. Special requests by management for more frequent inspections by the PMA should be given favorable consideration as the workload permits.

#### **6-1.2 Exemptions**

Exemptions from once a month inspection requirement may be granted by the installation PMA to food establishments that demonstrate by past performance, current training, and effective management the exemption will most probably not adversely affect overall sanitary conditions. In all cases Navy and Marine Corps food establishments must be inspected at least once each quarter. Written exemptions are not required.

### **6-2 REPORT OF INSPECTION**

- 6-2.1 INSPECTION FORM**
- 6-2.2 INSPECTION FORM DISTRIBUTION**
- 6-2.3 INSPECTION GUIDE**

#### **6-2.1 Inspection Form**

Navy and Marine Corps food establishments must be inspected by the PMA in company with the person in charge or their designated representative. The findings of the PMA must be recorded on the Food Establishment Inspection Report. This form is included in Appendix C of this chapter.

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### **6-2.2 Inspection Form Distribution**

The completed Food Establishment Inspection Report will be distributed as follows:

- a. Original to the commanding officer having direct responsibility for the food establishment.
- b. Copy to the person in charge.
- c. Retain a file copy for the PMA.

### **6-2.3 Inspection Guide**

The inspection guide is exhibited in Appendix C and can be used as a reference checklist to remind inspectors and food establishments of the major inspection areas.

## **6-3 FOOD ESTABLISHMENT INSPECTION REPORT**

### **6-3.1 INTRODUCTION**

### **6-3.2 ADMINISTRATIVE DATA**

### **6-3.3 VIOLATION DATA**

### **6-3.4 RISK CATEGORIZATION OF FOOD ESTABLISHMENTS**

### **6-3.5 TYPES OF INSPECTIONS**

### **6-3.1 Introduction**

When preparing the Food Establishment Inspection Report, NAVMED 6240/1, enter the data on the report form in the appropriate field. Use continuation pages to give a full description of the conditions found in the establishment.

### **6-3.2 Administrative Data**

- a. Enter the administrative data to clearly identify the food establishment and update the information when necessary. Use abbreviations where they do not interfere with reliable identification of the establishment.
- b. Use the Inspection Type (Insp. Type) when recording the reason for the inspection. Use the Time blank for recording the time of day the inspection was made.
- c. Use the Risk Category Section to designate the Food Establishment's Risk Type Category.

## 6-3.3 Violation Data

a. Record inspection findings on the NAVMED 6240/1 to detail the violations found during the inspection of the establishment. The form is designed to maximize the opportunity for capturing relevant information about the violations found at the time of the inspection. Use as many of the rows of the violation description section as are needed to describe the violation.

b. Indicate critical violations in the **first column, Category**, using an X. Always list the critical violations first for emphasis. Leave a blank line between individual violations cited.

c. Note repeat violations with an X in the **second column, Repeat**. Repeat items are those that were in violation on the last inspection. Indicating in this column when the original violation occurred may also be helpful.

d. Record specific NAVMED P-5010-1 section references in the **third column, Code References**. The Food Service Inspection Guide, **List of Frequent Discrepancies**, provides the basis for the noted violation and helps the person in charge to find the actual NAVMED P-5010-1 requirement. It is important to standardize inspectors in their accurate citing of the NAVMED P-5010-1. Succinctly provide the specifics of the observed violation in the **fourth column, Violation Description/Remarks/Corrections**. Record any explanations or other data, including the fact that a correction was made during the inspection. Use as many lines as necessary to explain the details of the violation. Legibility is important.

## 6-3.4 Risk Categorization of Food Establishments

a. Studies have shown a relationship between types of food served, preparation steps, volume of food, population served, previous compliance history and food borne illness. Each PMA will set a fixed risk category for each food establishment operating in their area of responsibility.

b. The rational allocation of inspection resources to target the highest risk establishments with more inspection time and the lowest risk establishments with the least is an HACCP approach concept. Risk categorization allows establishments to be ranked by considering risk factors and creating a variable inspection frequency for each category. An example of risk categorization and types of facilities is shown in Table 1-7.

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**Table 1-7. Risk categorization of food establishments**

<b>RISK TYPE</b>	<b>RISK TYPE CATEGORY DESCRIPTION</b>	<b>FACILITY TYPE</b>
1	Prepackaged nonpotentially hazardous foods only. Limited preparation of non-potentially hazardous foods only.	AROs
2	Limited menu (1 or 2 main items). Pre-packaged raw ingredients are cooked or prepared to order. Retail food operations exclude deli or seafood departments. Raw ingredients require minimal assembly. Most products are cooked/prepared and served immediately. Hot and cold holding of potentially hazardous foods is restricted to single meal service. Preparation processes requiring cooking, cooling, and reheating are limited to 1 or 2 potentially hazardous foods.	HOT DOG TRAILER  SMALL DELI
3	Extensive handling of raw ingredients. Preparation process includes the cooking, cooling, and reheating of potentially hazardous foods. A variety of processes require hot and cold holding of potentially hazardous food. Advance preparation for next day service is limited to 2 or 3 items. Retail food operations include deli and seafood departments. Establishments doing food processing at retail.	LARGE DELI SMALL CLUB
4	Extensive handling of raw ingredients. Preparation processes include the cooking, cooling, and reheating of potentially hazardous foods. A variety of processes require hot and cold holding of potentially hazardous foods. Food processes include advanced preparation for next-day service. Category would also include those facilities whose primary service population is immunocompromised.	FULL SERVICE FACILITIES  (Shore galleys, ship and submarine galleys)

c. Previous compliance history should also be considered when establishing inspection frequency. Nonconformance with critical code items or HACCP plan requirements may move an establishment up into more frequent inspections until a record of

more consistent compliance is achieved.

d. There is a wide variety of methods for assigning establishments to risk categories. The simplest method for that jurisdiction is often the best.

e. Resources need to be allocated for seasonal and temporary food establishment operations. Frequently, this involves scheduling inspections on weekends and during evening hours.

f. It may be useful to schedule a number of inspections during the evening hours to get a more balanced view of certain food operations.

g. One or more of the routine inspections may be replaced with such alternatives as a full-scale HACCP study, or a staff training session.

### **6-3.5 Types of Inspections**

a. Inspections are generally unannounced to obtain a more accurate assessment of normal operating practices and conditions. Exceptions include construction and preoperational inspections, HACCP studies, and follow up inspections, requiring the presence of specific personnel from the establishment. Full documentation should be maintained on each inspection as a part of the establishment's official agency record.

b. Inspections determine the food establishment's compliance with the NAVMED P-5010-1. These inspections may be categorized by purpose such as:

#### **(1) Pre-operational Inspection**

(a) A pre-operational inspection shall be conducted to ensure the establishment is built or remodeled per the approved plans and specifications. It is helpful to have plans and specification documents available during the inspection.

#### **(2) Routine Inspection**

(a) A full review of the food establishment operations and facilities and their impact on food safety is conducted. This includes assessment of food employee and management health, practices, and knowledge of food safety; food flows, source, storage, thawing, preparation (including cooking temperatures and times) and postpreparation processes; equipment and facility construction; cleaning and sanitizing processes; water sources; sewage disposal; and vermin control.

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(b) Detailed reports are prepared at the conclusion of each inspection and presented to the person in charge. Non-compliance is categorized as critical or noncritical. Repeat items are also noted. The NAVMED P-5010-1 section in violation is included in the report citation section.

### **(3) Follow Up Inspection**

(a) PMA personnel shall verify that critical violations have been corrected at the time of inspection or within 10 days of the initial routine inspection. Follow up inspections should be briefer than the routine inspection, since they concentrate on the critical violations previously reported.

(b) Corrections and continued violations should be noted on an inspection report. Continued violations should be used to initiate further compliance actions. Time available for follow up inspections will vary between jurisdictions. The compliance strategy is more effective if those follow ups are mandated in a realistic fashion, taking available resources into account.

**(4) HACCP Inspection** (See Model HACCP Inspection Data Form in Appendix C)

(a) Establishments operating under a variance requiring a HACCP plan are inspected differently. HACCP critical limits must be routinely monitored and recorded by the establishment and elements of the plan must be verified by the inspector.

(b) Copies of the HACCP plan are useful during these inspections. Additional time may be necessary to fully assess the establishment's compliance with the HACCP plan. Verifying the maintenance of the required records is an important element of the HACCP inspection. Notation in the records of process deviations that occurred and corrective actions taken in response to those deviations should not be cited as adverse findings.

### **(5) Complaint Inspection**

(a) Consumer complaints received by the PMA about a food establishment requires investigation. Quick response is required for complaints related to food borne illnesses. Speed is essential to preserve memories, food and environmental samples.

(b) HACCP principles can be used to supplement traditional procedures for investigation of food borne illness.

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It helps focus the investigation on foods which have been epidemiologically linked with illness.

(c) Other foods should not be completely dismissed because as more becomes known about the causes of food borne illness, foods which may not have been historically linked to illnesses are being implicated.

(d) The charting of food product flows and the designation of critical control points can help delineate potential problems. If a hazard seems evident, the suspect product or process can be recreated with the cooperation of the establishment and the critical limits monitored.

(e) Consumer complaints about food establishments should be evaluated in terms of public health significance before scheduling inspections. For example, allegations about an establishment purchasing shellfish from an illegal source should receive a higher priority than unsanitary public restrooms.

### **6-4 ESTABLISHMENT SCORING**

#### **6-4.1 INTRODUCTION**

#### **6-4.2 SCORING METHODS**

#### **6-4.3 DEBITING METHODOLOGY**

#### **6-4.1 Introduction**

a. Certain NAVMED P-5010-1 violations are imminent health hazards and require immediate action. Sewage backed up in a food preparation area is an example of an imminent health hazard. Imminent health hazards require immediate intervention and may require closure of the facility.

b. Critical items are NAVMED P-5010-1 violations more likely to contribute to food contamination, illness, or environmental degradation and represent substantial public health hazards.

c. The NAVMED P-5010-1 allows the PMA to use professional judgement regarding some of the violations to determine their seriousness based on the likelihood of an event occurring.

#### **6-4.2 Scoring Methods**

a. The Food Establishment Inspection Report is based on citing violations in two categories, critical and noncritical. Each of the violations are expected to be corrected within given timeframes. The score, which is the number of items in

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violation, is significant as an indicator of the overall control of the causes of food borne illness; however, there is no defined point at which a score translates into a significant health hazard. It is possible to have only one critical violation which has the potential for causing a food borne illness outbreak.

b. Fixed Categorization will be utilized to score establishments by using critical and non critical categories.

### (1) Fixed Categorization

(a) In this method, a fixed number of maximum critical violations is selected for each category of establishments. The Table of Critical Violations (Table 1-8) illustrates one application of this method.

(b) The number of violations used may be adjusted to accommodate current levels of resources in the agency and varying levels of compliance at the command.

(c) When a food establishment exceeds one of the critical violation limits the PMA must promptly notify the commanding officer and the PMA will increase the frequency of inspections for the food establishment until compliance history significantly improves.

**Table 1-8. Critical violation limits by facility type**

Facility Type	Critical Violation Limits
1	2
2	4
3	7
4	7

### 6-4.3 Debiting Methodology

It is essential to standardize the inspection process. The following process specifies what constitutes a violation of the NAVMED P-5010-1:



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a. Items are marked as violations on the inspection report when they clearly exist in the food establishment. A violation represents a deviation from a NAVMED P-5010-1 provision. Slight violations, such as one dirty utensil among thousands of clean ones, does not indicate that the establishment is significantly deviating from the requirement to use clean utensils.

b. Each violation of a NAVMED P-5010-1 provision is reported as a separate item on the inspection report. This does not mean that each instance should be considered a distinctly separate reportable violation. Some discretion is warranted when preparing the inspection report.

(1) For example, a cooler with mechanical problems may result in a dozen or more potentially hazardous food items being held at unsafe temperature. It may categorically be considered a malfunctioning refrigeration device under **Cooling, Heating, and Holding Capacities**, because repairs are needed to bring the unit into compliance. The food temperature violation is also cited only one time under, **Potentially Hazardous Food, Hot and Cold Holding**. Additionally, each food out of acceptable time/temperature range should be discarded by the food establishments manager and disposition noted on the report.

(2) Alternatively, the unit may be properly functioning, but improper cooling practices were used, resulting in the high temperatures being found in the potentially hazardous food. This would be a violation of **Cooling Methods, and Potentially Hazardous Food, Hot and Cold Holding**.

(3) If 12 separate coolers were found with items out of temperature as the result of 12 separate instances of improper practices by employees, each instance should be individually cited as a critical violation. The details included in each citation should clearly delineate the conditions found in each instance.

(4) Failure to clean floors is another example which can be easily visualized. A large meat cutting room may have numerous separate areas requiring cleaning. If there is a build-up of old food debris and other filth on the floor of the room in five separate areas, then one violation would exist. However, if the cleaning problem existed in multiple rooms, one violation is cited for each.

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### **6-5 CLOSURE CRITERIA**

If the PMA considers any one or more violations a significant danger to health, the PMA will promptly notify the commanding officer and recommend the facility immediately cease food service until the significant danger to health has been eliminated.